

REMARKS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-8 and 10-21 are pending in the present application. Claim 9 is canceled without prejudice, Claims 1, 6-8 and 10 are amended and new Claims 15-21 are added by the present amendment.

Amendments to Claims 1, 6-8 and 10 and new Claims 16-21 find support in the originally filed claims and application at least at page 20, line 21, to page 21, line 10. Further, new Claim 15 finds support at least in originally filed Claims 1 and 9. Thus, it is believed no new matter is added.

In the Office Action mailed June 1, 2004, Claims 1-5 and 10-14 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,649,218 to Saito in view of U.S. Patent No. 6,526,410B1 to Aoyama et al. (herein "Aoyama") and U.S. Patent No. 5,983,248 to DeRose; and Claims 6-9 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,535,875B2 to Takahashi et al. (herein "Takahashi") in view of U.S. Patent No. 6,230,173B1 to Ferrel et al. (herein "Ferrel") and DeRose.

Initially, Applicants gratefully acknowledge the courtesy of a personal interview with Examiner Nguyen on October 5, 2004. During the interview, rejections in the outstanding Office Action and differences between the claimed invent and cited references were discussed. Comments discussed during the interview are reiterated below.

Applicants respectfully traverse the rejection of Claims 1-14 under 35 U.S.C. § 103(a) as unpatentable over Saito in view of Aoyama and DeRose, and as unpatentable over Takahashi in view of Ferrel and DeRose.

Amended Claim 1 is directed to a document editing system for editing a document in a computer. The document editing system includes, *inter alia*, means for managing

generation and deletion of a tag pair in a document. The tag pair defines a document area and includes a start tag that identifies a start of the document area, an end tag that identifies an end of the document area, and a unique identifier that is attached to each start and end tag. The unique identifier is uniquely associated only with the document area defined by the tag pair. Independent Claims 6-8, 10 and 15 include similar features.

In a nonlimiting example, Figure 3 shows document area A that is defined by start tag “r” and end tag “/r” in the document. Further, a unique identifier, “1”, is attached to the start tag and the end tag, and the unique identifier is uniquely associated only with document area A. Further, in the example of Figure 3, document area B is defined by a different start tag “r” and end tag “/r” each attached to the unique identifier “2”, which is uniquely associated with document area B.

In addition, in this example the unique identifiers are attached to the start and end tags by an attachment symbol “:”, as recited in new Claims 16-18. Thus, in the example of Figure 2, “r:1” is the start tag that identifies the start of document area A with an attached unique identifier and “/r:2” is the end tag that identifies the end of document area B with an attached unique identifier.

A document editing system with this arrangement advantageously allows areas of the document to be uniquely distinguished from one another, thereby allowing greater flexibility in representing the attributes of the document area.<sup>1</sup>

As noted in the outstanding Office Action, Saito, Aoyama, Takahashi, and Ferrel do not disclose a unique identifier which is attached to each start and end tag.<sup>2</sup> Further, Applicants respectfully submit that DeRose also does not teach or suggest a unique identifier which is attached to start and end tags in the document.

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<sup>1</sup> Specification at page 2, lines 16-23.

<sup>2</sup> Office Action at page 7, line 6, and page 8, lines 6-8.

As discussed during the interview, DeRose describes a data processing system for generating a representation of electronic documents (e.g., a browser).<sup>3</sup> DeRose indicates that "the representation of the document further includes unique element identifiers assigned to each element in the document. The fields of the element directory store the unique identifiers for their corresponding elements."<sup>4</sup> In other words, DeRose indicates that a *representation of a document*, and not the document itself, includes unique element identifiers assigned to each element in the document. In particular, DeRose Fig. 6 shows a table (i.e., representation of a document) stored separately from the document, and the table stores the assignment of element identifiers to document elements. Thus, DeRose does not indicate that the assignment of element identifiers to document elements is stored in the document itself, and therefore, the assignment of element identifiers to document elements in DeRose does not include start tags and end tags in the document that are attached to unique identifiers. Accordingly, Applicants respectfully submit that DeRose does not teach or suggest "a tag pair in the document that defines a document area including a start tag that identifies a start of the document area, an end tag that identifies an end of the document area, and a unique identifier which is attached to each start and end tag," as recited in the independent claims.

Further, as discussed during the interview, DeRose indicates that "normal start tags 45 also include attributes which are often useful for marking text which is to be hidden for security or other reasons or for attaching a unique identifier for an element for cross-referencing or other uses. Thus, DeRose indicates that start tags may include attributes for attaching an identifier but does not indicate that start tags in the document are attached to unique identifiers. Further, DeRose does not indicate that end tags include attributes for attaching an identifier. Thus, it is respectfully submitted that DeRose does not teach or

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<sup>3</sup> DeRose at Abstract.

<sup>4</sup> DeRose at col. 4, lines 53-57.

suggest "an end tag that identifies an end of the document area, and a unique identifier which is attached to each start and end tag," as recited in the independent claims.

Accordingly, it is respectfully submitted that independent Claims 1, 6-8, 10 and 15 patentably define over DeRose. Further, as discussed above, Saito, Aoyama, Takahashi, and Ferrel also do not teach the features of the independent claims. Thus, Applicants respectfully submit that independent Claims 1, 6-8, 10 and 15, and claims depending therefrom, are allowable.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, P.C.



Eckhard H. Kuesters  
Registration No. 28,870

Customer Number  
**22850**

Tel: (703) 413-3000  
Fax: (703) 413 -2220  
(OSMMN 06/04)

EHK:ZSS:dnf